

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
Jennifer Schaeffer	:	
DEBTOR	:	BKY. NO. 17-11784JKF13
Jaclyn Stasik	:	
Plaintiff	:	
vs.	:	ADV. NO. 17-182JKF
Jennifer Schaeffer	:	
Defendant	:	

**STIPULATION**

THIS STIPULATION is entered by and between the above parties to resolve the adversary action.

WHEREAS, debtor filed a Chapter 13 petition to reorganized debt.

WHEREAS, debtor listed a disputed, unliquidated claim to Plaintiff Stasik.

WHEREAS, the parties have agreed to resolve the adversary action and issues concerning plan treatment as follows;

1. The parties agree that Debtor will amend her plan with payment terms of \$150 for 4 months (4/17 thru 7/17) and \$300 for 56 months, (8/17 thru 3/22) for a total base amount of \$17,400.
2. The amended plan will separately classify Stasik as an unsecured creditor.
3. As an alleged non-dischargeable claim, the parties agree that proceeds of the Chapter 13 plan after administrative expenses will be distributed to Stasik. Any other amended plan thereafter, that is required by the court or trustee concerning other unsecured creditors, will not affect this settlement. Debtor will assure that the plan pays Stasik at least \$11,660.
4. Stasik agrees to accept said distribution under the amended plan and will not object to confirmation.
5. Schaeffer will not object to Stasik's proof of claim, but in no manner, does that constitute any admission of liability.
6. Upon successful completion of the amended plan or any future amended plan that is required that pays movant the same

distribution and upon Chapter 13 Discharge, Stasik's claim is discharged and satisfied.

7. If this case is dismissed for non-payment or any other reason or converted to a Chapter 7 bankruptcy, this agreement will be null and void and Stasik will be allowed to proceed with the non-dischargeability litigation in a Chapter 7, Chapter 13, or state court action, and shall retain all other remedies available at law if such action is dismissed.
8. This is the entire agreement between the parties and can only be modified by agreement of the parties and court approval.

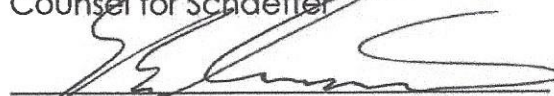
Respectfully submitted,

Dated: 8/17/17

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\_\_\_\_\_  
Michael A. Cataldo, Esquire  
Counsel for Schaeffer



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Benjamin Simmons, Esquire  
Counsel for Stasik

Approved by the Court,

\_\_\_\_\_  
Judge Jean K. FitzSimon  
Bankruptcy Judge